

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

Priscilla Sterling, Raine Becker, Shawn  
Miller, and John Bennett, individually and  
on behalf of all others similarly situated,  
Plaintiffs,

v.

The City of Jackson, Mississippi; Chokwe  
A. Lumumba; Tony Yarber; Kishia  
Powell; Robert Miller; Jerriot Smash;  
Siemens Corporation; Siemens Industry,  
Inc.; and Trilogy Engineering Services  
LLC,

Defendants.

Civil No. 3:22-cv-531-KHJ-MTP

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME**

In accordance with the extensions of the deadlines for Defendants’ motions to dismiss, Plaintiffs Priscilla Sterling, Raine Becker, Shawn Miller, and John Bennett move to extend their deadlines to oppose all Defendants’ motions to dismiss to January 23, 2023. This includes the motions from all three Defendants families: (1) Siemens Corporation; Siemens Industry, Inc. (“Siemens”), (2) Trilogy Engineering Services LLC (“Triology”), (3) The City of Jackson, Mississippi, Chokwe A. Lumumba, Tony Yarber, Kishia Powell, Robert Miller, and Jerriot Smash (“City”).

The motion is made to provide Plaintiffs with adequate time to respond to Defendants’ motions to dismiss, particularly since those motions—as a result of the extensions requested by Defendants— will now not be filed until next week, which would otherwise require Plaintiff to oppose during the holiday period. *See* Dkts. 22 and 23 (seeking extensions of the deadline to respond to Plaintiffs’ September 16, 2022 complaint to December 12, 2022).

1 Counsel for Plaintiffs conferred with counsel for all Defendants, who do not  
2 oppose this motion. *See, e.g.*, dkt. 22 at 1 (confirming that Trilogy and Siemens  
3 considered and does not oppose this extension).

4 Given the length and nature of this motion, Plaintiffs request that the Court  
5 waive the customary requirement of a separate memorandum brief.

7 Dated: December 5, 2022 Respectfully submitted,

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1 **CERTIFICATE OF SERVICE**

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3 I, Jacob H. Polin, declare as follows:

4 I am employed in the law firm of Lieff Cabraser Heimann & Bernstein, LLP,  
5 whose address is 275 Battery Street, 29th Floor, San Francisco, California 94111-  
6 3339. I am readily familiar with the business practices of this office. At the time of  
7 transmission I was at least eighteen years of age and not a party to this action.

8 On December 5, 2022, I directed that the foregoing document be filed via the  
9 U.S. District Court's CM/ECF electronic system and a copy thereof was served  
10 upon all counsel of record:

11 **PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF**  
12 **TIME**

13  
14 I declare under penalty of perjury under the laws of the State of California  
15 that the above is true and correct and that this declaration was executed on  
16 December 5, 2022.

17 /s/ Jacob H. Polin

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